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May 30, 2024

VIA ECF

Hon. Gregory H. Woods
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *Daol Rexmark Union Station LLC et al. v. Union Station Sole Member, LLC*,
No. 1:22-cv-06649-GHW (S.D.N.Y.)

Dear Judge Woods:

On behalf of Defendant Union Station Sole Member LLC (“USSM”), we write pursuant to Rule 4(ii) of Your Honor’s Individual Rules of Practice in Civil Cases (the “Rules of Practice”) to request that certain documents filed in connection with USSM’s Opposition to Plaintiff’s Motion for Summary Judgment be filed under seal. As set out in Your Honor’s Individual Rules of Practice, USSM filed proposed redacted versions of its filings on ECF.

Specifically, USSM seeks leave to file the following exhibit under seal in order to protect commercially sensitive and personal information or because the documents were produced by Plaintiffs or a third-party and were designated “Confidential” under the Confidentiality Agreement in force in this Action:

- Press Declaration,
 - o Exhibit 1 – Trust and Servicing Agreement produced by non-party Wells Fargo
 - o Exhibit 2 – Mortgage Loan Agreement Modification produced by non-party Wells Fargo
 - o Exhibit 3 – Mezzanine Loan Agreement Modification produced by non-party Wells Fargo
 - o Exhibit 4 – Letter to Wells Fargo produced by non-party BlackRock
 - o Exhibit 5 – Letter to Wells Fargo produced by non-party BlackRock
 - o Exhibit 6 – Email with attachment produced by Plaintiffs
 - o Exhibit 7 – Email produced by non-party BlackRock
 - o Exhibit 8 – Email produced by Plaintiffs
- Ross Declaration
 - o Exhibit 2 – Exhibit from Evidentiary Hearing in Condemnation Action

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o Exhibit 3 – Recordings

To the extent the documents were produced by Plaintiffs or a third-party, USSM will inform the producing party that the documents have been filed in order to provide that party an opportunity to seek to seal the documents in perpetuity.

Additionally, USSM seeks to seal its Local Rule 56.1 Counterstatement (“CS”) and the Declarations of Joe Press and David Ross and to file redacted versions publicly. These documents contain quotations and paraphrased details from documents that are under seal, including USSM’s confidential documents that previously were filed under seal in connection with Plaintiffs’ summary judgment motion. To protect the integrity of the information that has been designated as Confidential, USSM seeks to redact that information from the publicly filed versions of these documents.

Respectfully,

/s/ David E. Ross

David E. Ross